

HL 038

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January 24, 1983

Federal Express

Joel G. Blumstein, Esq.
Office of Regional Counsel
United States Environmental
Protection Agency - Region I
John F. Kennedy Federal Building
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Superfund Records Center
SITE: Picillo
BREAK: 11.9
OTHER: 644655

Dear Mr. Blumstein:

This letter is in response to the letter of January 20, 1983, from Mr. Merrill S. Hohman, Director of the Waste Management Division for EPA Region I to David A. Rapaport, Vice President of Hydron Laboratories, New Brunswick, New Jersey. In that letter EPA "reiterates its position" that Hydron may be a responsible party under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, with respect to the Picillo Waste Disposal Site at Coventry, Rhode Island. This letter is not intended to respond to the EPA request on the question of our willingness to enter into "meaningful negotiations" with respect to possible remedial activities at the Picillo site; rather I am requesting of you, pursuant to the invitation expressed in the EPA letter of January 20, that you provide to us a list of those parties to whom similar "notice" letters were sent with respect to the Picillo site.

As I indicated in our telephone conversation of this evening, there is some urgency in our receiving this list of names as soon as possible because we are engaging in discussions with the State of Rhode Island within the week on the subject of possible joinder of additional parties in related state court litigation. The identity of parties to whom Federal notice letters have been sent obviously has a direct



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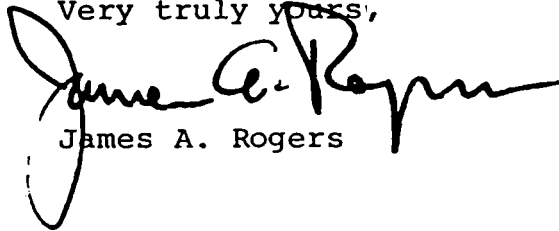
Joel G. Blumstein, Esq.
January 24, 1983
Page Two

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bearing on those discussions. Thus, I would appreciate your either calling me with the information as to these other parties or transmitting that information via telecopy or Express Mail. In any case, I would appreciate your calling me to indicate how the information will be transmitted. As I indicated in the opening paragraph, Hydron Laboratories will be responding in more detail to the substance of the January 20 letter.

We appreciate your cooperation.

Very truly yours,

A handwritten signature in black ink, appearing to read "James A. Rogers", is written over the typed name. The signature is fluid and cursive, with a large initial "J" and "R".

James A. Rogers

cc: David A. Rapaport
John F. Bomster